

Member Societies

The American Physiological Society
 American Society for Biochemistry and
 Molecular Biology
 American Society for Pharmacology and
 Experimental Therapeutics
 American Society for Investigative
 Pathology
 American Society for Nutrition
 The American Association of
 Immunologists
 American Association of Anatomists
 The Protein Society
 Society for Developmental Biology
 American Peptide Society
 Association of Biomolecular Resource
 Facilities
 The American Society for Bone and
 Mineral Research
 American Society for Clinical
 Investigation
 Society for the Study of Reproduction
 Teratology Society
 The Endocrine Society
 The American Society of Human
 Genetics
 Society for Gynecologic Investigation
 Environmental Mutagen Society
 International Society for
 Computational Biology
 American College of Sports Medicine
 Biomedical Engineering Society

April 7, 2009

Jean Feldman
 Head, Policy Office
 Division of Institution and Award Support
 National Science Foundation
 4201 Wilson Blvd.
 Arlington, VA 22230

BY ELECTRONIC MAIL TO: RCRinput@nsf.gov

Dear Ms. Feldman:

On behalf of the Federation of American Societies for Experimental Biology (FASEB), thank you for the opportunity to provide feedback on the National Science Foundation's (NSF's) proposed responsible and ethical conduct of research (RCR) training policy. FASEB strongly supports providing RCR training to all undergraduates, graduate students, and postdoctoral scholars engaged in research regardless of their source of research support. RCR training is an integral component of the education and professional development of scientists and is essential for ensuring the highest standards of scientific integrity in research.

The provision of *RCR training is a joint responsibility of institutions and investigators*. Principal investigators are expected to lead by example, demonstrating responsible conduct in all of their research and scholarly activities. In addition, FASEB believes investigators should have a plan for mentoring their students and postdoctoral scholars that addresses how trainees will acquire RCR education. Investigators should be aware of any RCR training requirements applicable to their trainees, be prepared to advise trainees on how to acquire RCR training, and play a role in ensuring that trainees fulfill any training requirements.

Institutions also have a responsibility to ensure that students and postdoctoral scholars supported by NSF receive RCR training and that the information about training requirements is clearly communicated to principal investigators. FASEB believes that institutions should, however, have the flexibility to develop and implement RCR training programs tailored to their individual needs. The nature of an institution's training plan will undoubtedly depend on a number of factors, including the size of its trainee population, its access to resources, and its institutional culture, among others. RCR education plans should also be flexible enough to accommodate the needs of trainees, which will vary depending on the type of research in which they are engaged, their role in that research, and their stage of training. Allowing institutions to explore a diversity of approaches to meeting the RCR training requirements would not only enable them to develop plans that most effectively meet their needs, but also facilitate the identification and dissemination of best practices.

FASEB applauds NSF's plan to support the development of educational materials related to RCR training. A series of web-based training modules that institutions could use "as-is" or modify would be an effective component of RCR

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education. Modular training would minimize the burden on program participants by allowing individuals to participate in only those modules that are relevant to their research, and web-based technology could be a cost-effective way to administer training and to monitor program participation. NSF and the institutions it supports should explore opportunities to partner with the Department of Health and Human Services' Office of Research Integrity, as well as with private organizations involved in the development of RCR educational materials and best practices, such as the National Postdoctoral Association and the Council of Graduate Schools. They should also seek input from professional societies on the development of appropriate discipline-specific training tools.

Even with access to educational materials, the implementation and administration of new training programs is not without cost. NSF should explore ways to fund these efforts so that additional training requirements do not burden institutions with new, unfunded mandates. This is particularly important in the current fiscal climate when many institutions are urgently trying to reduce costs.

Thank you very much for considering our input on this important topic. Please do not hesitate to contact me if FASEB can be of further assistance as NSF develops and implements its RCR training policy.

Sincerely,

A handwritten signature in cursive script that reads "Richard B. Marchase".

Richard B. Marchase, Ph.D.
FASEB President